

To: Mark Koontz[Mark.Koontz@ci.bremerton.wa.us]
From: Chris Wion
Sent: Wed 3/17/2010 2:51:00 PM
Subject: RE: Settlement Agreement

Mark,

We will have their signatures notarized.

-Chris

-----Original Message-----

From: Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]
Sent: Wednesday, March 17, 2010 2:35 PM
To: Chris Wion
Subject: RE: Settlement Agreement

Thanks. We have not yet discussed Ms. Ho's position with respect to the agreement. I assume that you or your client has discussed this with her and she is in agreement. I also assume that Ms. Ho will accompany your client to sign the documents. Am I correct in my assumptions? Also, I would like to have Ms. Sesko and Ms. Ho's signatures notarized since the agreement concerns the transfer of real property. Any objection?

-Mark

Mark E. Koontz
Assistant City Attorney
City of Bremerton
345 Sixth Street, Ste. 600
Bremerton, WA 98337
360-473-2345
mark.koontz@ci.bremerton.wa.us

ATTORNEY-CLIENT PRIVILEGED COMMUNICATION

This e-mail message and its attachments may contain confidential attorney work product and be subject to the attorney-client communication privilege. It is intended solely for the use of the individual named above. If you are not the intended recipient, or the person responsible to deliver it to the intended recipient, you are hereby advised that any dissemination, distribution or copying of this communication is prohibited. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and delete and/or destroy the original and all copies of the e-mail message.

From: Chris Wion [mailto:chrisw@dhl.com]
Sent: Wednesday, March 17, 2010 2:29 PM
To: Mark Koontz
Subject: RE: Settlement Agreement

Mark,

As discussed, attached please find our red-lined changes to the draft Settlement Agreement and Utility Easement.

-Chris

-----Original Message-----

From: Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]

Sent: Wednesday, March 17, 2010 1:30 PM
To: Chris Wion
Subject: RE: Settlement Agreement

just left you a voice mail.

Mark E. Koontz
Assistant City Attorney
City of Bremerton
345 Sixth Street, Ste. 600
Bremerton, WA 98337
360-473-2345
mark.koontz@ci.bremerton.wa.us

ATTORNEY-CLIENT PRIVILEGED COMMUNICATION

This e-mail message and its attachments may contain confidential attorney work product and be subject to the attorney-client communication privilege. It is intended solely for the use of the individual named above. If you are not the intended recipient, or the person responsible to deliver it to the intended recipient, you are hereby advised that any dissemination, distribution or copying of this communication is prohibited. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and delete and/or destroy the original and all copies of the e-mail message.

From: Chris Wion [mailto:chrisw@dhl.com]
Sent: Wednesday, March 17, 2010 1:19 PM
To: Mark Koontz
Subject: RE: Settlement Agreement

Mark,

Please call me when you get a chance. Thanks.

-Chris

-----Original Message-----

From: Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]
Sent: Wednesday, March 17, 2010 9:15 AM
To: Chris Wion
Subject: RE: Settlement Agreement

Chris,

I think we can get it wrapped up today or tomorrow.

-Mark

Mark E. Koontz
Assistant City Attorney
City of Bremerton
345 Sixth Street, Ste. 600
Bremerton, WA 98337
360-473-2345
mark.koontz@ci.bremerton.wa.us

ATTORNEY-CLIENT PRIVILEGED COMMUNICATION

This e-mail message and its attachments may contain confidential attorney work product and be subject to the attorney-client communication privilege. It is intended solely for the use of the individual named above. If you are not the intended recipient, or the person responsible to deliver it to the intended recipient, you are hereby advised that any dissemination, distribution or copying of this communication is prohibited. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and delete and/or destroy the original and all copies of the e-mail message.

From: Chris Wion [mailto:chrisw@dhl.com]
Sent: Wednesday, March 17, 2010 8:27 AM
To: Mark Koontz
Subject: RE: Settlement Agreement

Mark,

As you know, first thing on Monday morning, March 8, I provided you with a red-lined copy of the draft Settlement Agreement and Utility Easement. On Thursday, March 11, we discussed the various proposed changes and you indicated that you would provide the City's response the next day, Friday, March 12. Then, on Monday, March 15, I sent the below email, requesting an updated ETA for the City's response. Yesterday morning, you indicated that the City would respond by the afternoon. We are still awaiting the City's response.

While I recognize that this process sometimes takes longer than expected, the Sheriff's sale is scheduled for this Friday, March 19, which obviously threatens to derail any effort to resolve the dispute according to the basic terms to which both parties have agreed. I think you will agree that the parties are not very far apart and that Ms. Sesko is making a good faith effort to finalize the documentation of the conceptual agreement. However, it is no longer reasonable to expect that we can conclude the process by the end of the day tomorrow (I am in court tomorrow afternoon).

I propose that the Sheriff's sale be postponed for an additional week to allow adequate time to resolve the few outstanding issues. Please let me know as soon as possible whether you agree.

-Chris

-----Original Message-----

From: Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]
Sent: Tuesday, March 16, 2010 9:12 AM
To: Chris Wion
Subject: RE: Settlement Agreement

this afternoon.

Mark E. Koontz
Assistant City Attorney
City of Bremerton
345 Sixth Street, Ste. 600
Bremerton, WA 98337
360-473-2345
mark.koontz@ci.bremerton.wa.us

ATTORNEY-CLIENT PRIVILEGED COMMUNICATION

This e-mail message and its attachments may contain confidential attorney work product and be subject to the attorney-client communication privilege. It is intended solely for the use of the individual named above. If you are not the intended recipient, or the person responsible to deliver it to the intended recipient, you are hereby advised that any dissemination, distribution or copying of this communication is prohibited. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and delete and/or destroy the original and all copies of the e-mail message.

From: Chris Wion [mailto:chrisw@dhl.com]
Sent: Monday, March 15, 2010 2:19 PM

BREMERTON-001196

To: Mark Koontz
Subject: Settlement Agreement

Mark,

When we spoke last week you indicated that you planned to send me a revised draft of the Settlement Agreement and Utility Easement last Friday. Can you please provide an updated ETA?

Thank you.

-Chris

Christopher T. Wion
Attorney at Law
Danielson Harrigan Leyh & Tollefson LLP
999 Third Avenue, Suite 4400
Seattle, Washington 98104
Tel: (206) 623-1700
Fax: (206) 623-8717

This internet e-mail message contains confidential, privileged information that is intended only for the addressee. If you have received this e-mail message in error, please call us (collect, if necessary) immediately at (206) 623-1700 and ask to speak to the message sender. Thank you. We appreciate your assistance in correcting this matter.